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Attorney for Defendants

National Retail Consulting Group,
Inc. and Global Marketing & Sales
Group, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

N.V.E., INC.

:

Plaintiff, :

-vs-

:

Civil Action No. **06-5455**
(Hon. Madeline Cox Arleo)
(Hon. Leda Dunn Wettre)

**CROSSCLAIM FOR CONTRIBUTION
AND INDEMNIFICATION**

JESUS J. PALMERONI a/k/a Jo- :
seph Palmeroni, **MICHELLE HOOEY** :
a/k/a Michelle Palmeroni, **MA-** :
RIA C. PALMERONI, **VINCENT RO-** :
SARBO, **ANGELINA ROSARBO**, **NI-** :
COLE DILUNCO, **NATIONAL RETAIL** :
CONSULTING GROUP, INC., **AMERI-** :
CAN WHOLESALE DISTRIBUTION, :
SMART WORLD, INC., **FOREMOST** :
INTERNATIONAL, GLOBAL MARKE- :
TING & SALES GROUP, LLC, VAR :
CONSULTING, INC., **RONALD SU-** :
MICK, SUNBELT MARKETING, IN- :
TERNATIONAL SALES GROUP, RICH- :
ARD D. HOROWITZ, JERALD I. HO- :
ROWITZ, PROFIT MOTIVATORS, INC. :
PMI GLOBAL MARKETING CORP., :
DIRK NIEUWENHUIS, CARLOS BEN- :
GOA, CB DISTRIBUTORS, INC., :
DARREN HOUSEHOLDER, BRAND NEW :
ENERGY, INC., **STEVE R. SES-** :
SIONS, SESSIONS SPECIALTY COM- :
PANY, JARRETT W. PORTZ, JOHN :
J. PORTZ, SR., KATHERINE M. :
PORTZ, INTERNATIONAL WHOLESALE: :
SERVICE, INC., **INTERNATIONAL** :
WHOLESALE SUPPLY, INC., **ALFRE-** :
DO D. FELICE, CHARMAINE C. FE-

LICE, CURTIS BEVERAGE, LLC, :
SMART WORLD (NETHERLANDS), VI- :
TAL PARMA, T & J LIMITED, ABC :
COMPANIES 1-10 and JOHN DOES :
1-10, :

Defendants. :

JESUS J. PALMERONI, :

Third Party Plaintiff, :

-vs- :

ROBERT OCCHIFINTO and WALTER :
ORCUTT, :

Third Party Defendant. :

Jesus J. Palmeroni, residing at 413 Route 940, Mount Pocono, Pennsylvania 18344 ("Palmeroni"), crossclaims against Vincent Rosarbo as follows:

CROSSCLAIM FOR CONTRIBUTION

Although Palmeroni denies liability to the plaintiff, if the Court should find him liable for damages, Palmeroni is entitled to contribution from defendant Vincent J. Rosarbo under the Joint Tortfeasors' Contribution Act, N.J.S.A.2A:53A-3.

CROSSCLAIM FOR INDEMNIFICATION

Although Palmeroni denies liability to the plaintiff, if the Court should find him liable for damages, Palmeroni is entitled to indemnification from defendant Vincent J. Rosarbo because Rosarbo discarded records of their jointly owned company without

the authorization of Palmeroni, which records are needed for the defense of this action.

Dated: December 12, 2015



Robert A. Vort